

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND

In re: \*  
MATT GUZIK \* Case No. 14-2-1901-JS  
(Chapter 7)  
\*  
Debtor  
\* \* \* \* \* \* \*  
MATT GUZIK \* Adversary No. 14-0-0723  
Plaintiff \*  
v. \*  
FORD MOTOR CREDIT COMPANY LLC \*  
Defendant \*  
\* \*

**OPPOSITION TO AMENDED MOTION FOR SUMMARY JUDGMENT**

Ford Motor Credit Company LLC, by its attorney, Michael J. Klima, Jr., files its opposition to the Amended Motion For Summary Judgment. The Plaintiff continues to fail to assert any facts that cannot be disputed to support any such factual position by citing to particular parts of materials in the record. F.R.Civ.P. 56(c)(1), F.R.Bankr.P. 7056. Accordingly, Defendant requests the Court deny the Amended Motion For Summary Judgment.

/s/ Michael J. Klima, Jr.  
Michael J. Klima, Jr. #25562  
810 Glen Eagles Court  
Suite 312  
Baltimore, MD 21286  
(410)837-1140  
Attorney File: 10-2037

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15<sup>th</sup> day of December, 2014,  
a copy of the foregoing Opposition To Amended Motion For  
Summary Judgment was mailed, first class, postage prepaid, to:  
  
Marc A. Ominsky, Esquire  
10632 Little Patuxent Parkway  
Suite 249  
Columbia, MD 21044  
  
Marc H. Baer  
Chapter 7 Trustee  
455 Main Street  
Reisterstown, MD 21136

/s/ Michael J. Klima, Jr.  
Michael J. Klima, Jr.